



Dr. Bernard LaFayette Jr
Chairman of the Board

Dr. Charles Steele Jr
President/CEO

September 7, 2016

The Honorable Tom Wheeler
Chairman, Federal Communications Commission
455 Twelfth Street, SW
Washington, DC 20554

Re: Business Data in an Internet Protocol Environment, WC Docket 16-43; Investigation of Certain Price Cap Local Exchange Carrier Business Data Services Tariff Pricing Plans, WC Docket 15-247; Special Access Rates for Price Cap Local Exchange Carriers, WC Docket 05-25; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Special Interstate Special Access Services, RM 10593

Dear Chairman Wheeler,

On behalf of the Southern Christian Leadership Conference, we urge the Commission to consider the unintended consequences of any final rulemaking affecting the “Business Data Services” (BDS) market. We respectfully request the Commission consider its impact on American workers and small business, from whom the lifeblood of our economy flows. As we prepare to celebrate the 50th Anniversary of Dr. King’s Poor Peoples’ Campaign, we are working tirelessly to make sure our voices are heard on any issue that affects the ability of Americans to participate in this economy and pull themselves out of poverty.

We have been made aware of the very serious concerns other groups have about the potential for negative consequences from this rule. And, While we understand the Commission’s need and desire to improve and modernize the current BDS rate structure, we urge you to consider the impact on “competition” in the marketplace. It is our understanding that one of the unintended consequences of any decision may be a “race to the bottom” for wages and workers rights that could harm underserved communities. Competition should foster service and innovation, and not result in lower wages and living standards for workers.

It is rare for us to intervene in matters like these, but we feel the potential long term effects could be detrimental and hard to reverse. And, as we have seen in other areas, our communities always suffer a disproportionate negative impact from the unintended consequences of policy decisions.



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In short, we have been told for decades that the new digital economy would help empower and enrich our communities and we implore you not to establish a rule that will bring about change at the expense of the working men and women, but instead promote quality jobs with livable wages and expanded investment in new networks for all communities.

Respectfully submitted,

Dr. Charles Steele, Jr

Cc: Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly